

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney

TOM COLTHURT (CABN 99493)  
Chief, Criminal Division

MICHAEL J. MORSE (CABN 291763)  
JUAN M. RODRIGUEZ (CABN 313284)  
Special Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (213) 894-7367/0304  
FAX: (213) 894-7631  
michael.morsel@usdoj.gov  
juan.rodriguez@usdoj.gov

Attorney for Petitioner United States of America

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES,

Plaintiff,

v.

BABAK BROUMAND AND  
MALAMATENIA MAVROMATIS,

Defendants.

Case No. CR-21-00162-WHO

**STIPULATION TO CONTINUE  
STATUS CONFERENCE FROM JUNE  
29, 2023 AT 1:30 PM TO JUL Y 27, 2023  
AT 1:30 PM, AND EXCLUDE TIME  
UNDER THE SPEEDY TRIAL ACT;  
AND [PROPOSED] ORDER**

STIPULATION

The parties hereby stipulate that the currently set status conference be continued from June 29, 2023, at 1:30 p.m. to July 27, 2023, at 1:30 p.m. Defendant BABAK BROUMAND is in custody in the Central District of California, serving a 72-month sentence, after being

1 convicted at jury trial in *United States v. Broumand*, 20-224-RGK(A). Defendant  
2 MALAMANTENIA MAVROMATIS is not in custody.

3 1. Defendant BABAK BROUMAND is in custody in the Central District of  
4 California after being convicted at jury trial in the related case of *United States v. Broumand*,  
5 20-224-RGK(A).  
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7 2. Additionally, counsel for defendant MALAMANTENIA MAVROMATIS is  
8 currently engaged in a state jury trial in Marin County Superior Court, *People v. Hector*  
9 *Gramajo-Diaz*, Case No.: CR209142A.  
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11 3. The government has produced over 60,000 pages of discovery to defendant  
12 MAVROMATIS, which primarily consists of business records, including bank, credit card,  
13 mortgage broker, title company, and escrow company records, tax returns, and witness  
14 interview reports.  
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16 4. On March 24, 2022, the government obtained a superseding indictment in this case  
17 adding defendant MAVROMATIS, who first appeared in this case on April 19, 2022, in  
18 which she was charged with two counts of False Statements on a Loan Application in  
19 violation of 18 U.S.C. § 1014 (Counts Four and Six). Prior to defendant MAVROMATIS's  
20 indictment, co-defendant BABAK BROUMAND had already been charged.  
21

22 5. Additionally, counsel for both defendants agree that additional time is needed for  
23 meaningful preparation for trial, including additional research and investigation, and  
24 discussions with their clients and the government regarding possible pretrial resolution. The  
25 parties are currently engaged in earnest pretrial resolution discussion that may obviate the need  
26 for trial.  
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1           6. The government and counsel for the defendants agree that time be excluded under  
2 the Speedy Trial Act so that defense counsels can continue to prepare for trial and engage in  
3 pretrial resolution discussions.  
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5           7. The parties stipulate and agree that excluding time until July 27, 2023, will allow  
6 for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further  
7 stipulate and agree that the ends of justice served by excluding the time from June 29, 2023,  
8 through July 27, 2023, from computation under the Speedy Trial Act outweigh the best  
9 interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).  
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11           8. The parties are also discussing resolution of this entire matter and require more time  
12 to discuss different settlement alternatives.

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1           9. The undersigned Assistant United States Attorneys certify that they have obtained  
2 approval from all counsel to file this stipulation and proposed order.

3 IT IS SO STIPULATED.

4  
5 DATED: June 27, 2023

/s/ Michael J. Morse  
MICHAEL J. MORSE  
JUAN M. RODRIGUEZ  
Special Assistant United States Attorney

8  
9 DATED: June 27, 2023

/s/ Steven F. Gruel  
STEVEN F. GRUEL  
Counsel for Defendant BROUMAND

11  
12 DATED: June 27, 2023

/s/ Paul H. Nathan  
PAUL H. NATHAN  
Counsel for Defendant MAVROMATIS

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15                                   [PROPOSED] ORDER

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17           Based upon the facts set forth in the stipulation of the parties and for good cause shown,  
18 the Court hereby continues the status conference from June 29, 2023, at 1:30 p.m. to July 27,  
19 2023, at 1:30 p.m.

20           Furthermore, the Court finds that failing to exclude the time from June 29, 2023,  
21 through July 27, 2023, would unreasonably deny defense counsel and the defendant the  
22 reasonable time necessary for effective preparation, taking into account the exercise of due  
23 diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

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25           The Court further finds that the ends of justice served by excluding the time from  
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1 June 29, 2023, through July 27, 2023, from computation under the Speedy Trial Act outweigh  
2 the best interests of the public and the defendants in a speedy trial. Therefore, and with the  
3 consent of the parties,  
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5 IT IS HEREBY ORDERED that the time from June 29, 2023, through July 27, 2023,  
6 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A),  
7 (B)(iv).  
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9 IT IS SO ORDERED.  
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12 DATED:

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HONORABLE WILLIAM H. ORRICK  
United States District Court  
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